

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

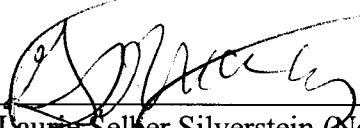
-----X	
In re:	) Chapter 11
	)
FOAMEX INTERNATIONAL INC.	) Case No. 05-12685 (KG)
	)
Reorganized Debtor.	)
-----X	
	)
THE BANK OF NEW YORK, AS INDENTURE	) Civil Action No. 07-00212 (JJF)
TRUSTEE,	)
	)
Appellant,	)
	)
v.	)
	)
FOAMEX INTERNATIONAL INC.	)
	)
Appellee.	)
	)
-----X	

**REQUEST OF APPELLANT THE BANK OF NEW YORK FOR ORAL ARGUMENT**

Pursuant to Federal Rule of Bankruptcy Procedure 8012, Appellant The Bank of New York, as Indenture Trustee, by and through its undersigned counsel, hereby requests that oral argument be heard on its appeal of the Bankruptcy Court for the District of Delaware's *Order Denying the Request of the Bank of New York, as Indenture Trustee, to Compel the Reorganized Debtors to Pay Post-Maturity Compound Interest on the 2005 Notes*.

Dated: July 25, 2007

POTTER ANDERSON & CORROON LLP

  
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Laurie Selker Silverstein (No. 2396)  
Gabriel R. MacConaill (No. 4734)  
Hercules Plaza  
1313 North Market Street, 6th Floor  
Wilmington, Delaware 19801  
Telephone: (302) 984-6000  
Facsimile: (302) 658-1192

-and-

DECHERT LLP  
Glenn E. Siegel  
Ross L. Hirsch  
Davin J. Hall  
30 Rockefeller Plaza  
New York, New York 10112  
Telephone: (212) 698-3500  
Facsimile: (212) 698-3599

*Counsel for The Bank of New York, as  
Indenture Trustee*

**CERTIFICATE OF SERVICE**

I, Gabriel R. MacConaill, certify that I am not less than 18 years of age and that on this 25th day of July, 2007, I caused a true and correct copy of the within **Request of Appellant the Bank of New York for Oral Argument** to be served upon the parties below in the matter indicated:

**APPELLEES:**

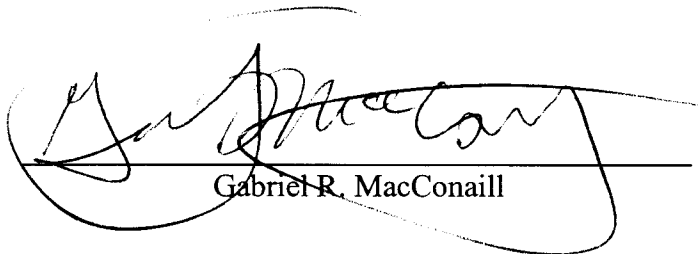
**BY HAND DELIVERY**

Pauline K. Morgan  
Joseph M. Barry  
Young Conaway Stargatt & Taylor  
The Brandywine Building  
1000 West Street, 17<sup>th</sup> Floor  
Wilmington, Delaware 19899

**BY EMAIL/AND FIRST CLASS MAIL**

Alan W. Kornberg  
Brian S. Herman  
Paul, Weiss, Rifkind, Wharton &  
Garrison LLP  
1285 Avenue of the Americas  
New York, New York 10019

Under penalty of perjury, I declare the foregoing to be true and correct.



Gabriel R. MacConaill